

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Liberty Property Holdings SC, LLC)	C/A No.: 4:22-CV-03556-RBH
individually, derivatively on behalf of)	
Renaissance Tower Horizontal Property)	
Regime, and on behalf of a class of all other)	
similarly situated; Azure Bleu, LLC; Edelyne)	
Beauvais-Thomas; Jason E. Blosser; Nicole M.)	NOTICE OF REQUEST FOR
Blosser; Eshellah D. Calhoun; Zachary G.)	PROTECTION FROM COURT
Calhoun, David DiMaio; Linda DiMaio; Susan)	APPEARANCES
H. Ferguson; Four Parts Whole, LLC; Sharon)	
M. Hubbard; Carol A. Messenger; Jeffrey S.)	
PALMER; Summalin, Inc.; Terry J. Tuminello;)	
Shelley Ware; and Jonathan S. Williams,)	
)	
Plaintiffs.)	
)	
v.)	
)	
Jeffrey L. Richardson; William S. Spears; Brent)	
M. Whitesell; Laurie Z. Wunderley; Madeline)	
R. Mercer; Catherin M. Gregor; Dennis S.)	
Sassa; Tracy A. Meadows; Peter A. Grusauska;)	
and William Douglas Management, Inc.,)	
)	
Defendants.)	

PLEASE TAKE NOTICE that Jaan G. Rannik, Esquire, of Epting & Rannik, LLC, attorney for Plaintiffs, respectfully moves this Court for an Order of Protection from being called to trial or having any motions or other hearings scheduled before this Honorable Court for the period of July 3, 2023 through August 15, 2023, for paternity leave.

Respectfully submitted:

This 18th day of April, 2023
Charleston, South Carolina

/s/ Jaan G. Rannik
EPTING & RANNIK, LLC
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